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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 CASE NO.: 2:12-cr-00472-JAD-CWH

17 Plaintiff,

18 vs.

19 ANTHONY HOROVITZ,

20 Defendant.

21 **STIPULATION AND ORDER TO EXTEND DEADLINE DATE TO RESPOND TO**
22 **GOVERNMENT'S MOTION FOR INSTALLMENT PAYMENT ORDER [48] SIXTH**
23 **REQUEST**

24 **IT IS HEREBY STIPULATED** by and between Anthony Horovitz, Defendant, by and
25 through his counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., of the law firm of Clark
26 Hill, PLLC, and the Plaintiff, United States of America, by and through Jason Frierson, United
27 States Attorney, and Summer A. Johnson, Assistant United States Attorney, to extend the time for
28 the Defendant to respond to Government's Motion for Installment Payment Order [DKT 48], filed
on July 7, 2022.

29 **IT IS HEREBY FURTHER STIPULATED AND AGREED** that the deadline for filing
any response be extended up to and including October 28, 2022.

30 This Stipulation is entered into for the following reasons:

31 1. The Response deadline date is September 27, 2022 [DKT 58].

1 2. The law firm of Clark Hill PLLC was retained on July 14, 2022.

2 3. Defense Counsel is in constant communication with the Government working toward an
3 effective resolution for all parties.

4 4. Defense Counsel prepared a comprehensive proposal to resolve this matter to the
5 satisfaction of all parties. The proposal was sent to Government's counsel on or about September
6 22, 2022.

7 5. On or about September 26, 2022, Government's counsel indicated she was in the process
8 of preparing a response to the defense's proposal and we may need more time to work out the
9 particulars of negotiations.

10 6. This Stipulation is necessary in order to allow Government's counsel the necessary time
11 to review the proposal and make a decision as to whether the proposal is sufficient to resolve
12 this matter without the necessity to reinstate briefing.

13 7. For these reasons, the parties agree that the Response to the Motion for Installment
14 Payment Order will be filed on October 28, 2022.

15 8. The additional time requested herein is not sought for purposes of delay and the denial
16 of this request for a continuance could result in a miscarriage of justice.

17 9. For all of the above-stated reasons, the ends of justice would be best served by the
18 continuance of the Response to Motion for Installment Payment Order.

19 10. This is a Sixth Request for a continuance of the response to the Motion for Installment
20 Payment Order.

21 JASON FRIERSON
22 UNITED STATES ATTORNEY
23 DISTRICT OF NEVADA

CLARK HILL PLLC

24 DATED this 26th day of September, 2022.

DATED this 26th day of August, 2022.

25 _____
26 /s/ Summer A. Johnson
27 SUMMER A. JOHNSON
28 Assistant United States Attorney
 Attorneys for Plaintiff,
 UNITED STATES OF AMERICA

/s/ Gia N. Marina
PAOLA M. ARMENI
GIA N. MARINA
Attorney for Defendant,
ANTHONY HOROVITZ

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

CASE NO.: 2:12-cr-00472-JAD-CWH

Plaintiff,

VS.

ANTHONY HOROVITZ,

Defendant.

FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

CONCLUSIONS OF LAW

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. The Response deadline date is September 27, 2022 [DKT 58].
2. The law firm of Clark Hill PLLC was retained on July 14, 2022.
3. Defense Counsel is in constant communication with the Government working toward an effective resolution for all parties.
4. Defense Counsel prepared a comprehensive proposal to resolve this matter to the satisfaction of all parties. The proposal was sent to Government's counsel on or about September 22, 2022.
5. On or about September 26, 2022, Government's counsel indicated she was in the process of preparing a response to the defense's proposal and we may need more time to work out the particulars of negotiations.
6. This Stipulation is necessary in order to allow Government's counsel the necessary time to review the proposal and make a decision as to whether the proposal is sufficient to resolve this matter without the necessity to reinstate briefing.

7. For these reasons, the parties agree that the Response to the Motion for Installment Payment Order will be filed on October 28, 2022.

8. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.

9. For all of the above-stated reasons, the ends of justice would be best served by the continuance of the Response to Motion for Installment Payment Order.

10. This is a Sixth Request for a continuance of the response to the Motion for Installment Payment Order.

11. The ends of justice are served by granting said continuances and outweigh the best interest of the public and since the failure to grant said continuances would be likely to result in a miscarriage of justice, as it would deny the parties herein sufficient time, and the opportunity, within which to effectively and thoroughly prepare and file responses, and replies, and taking into account the exercise of due diligence.

ORDER

IT IS FURTHER ORDERED that the deadlines for filing of responsive pleading, is hereby due on or before October 28, 2022.

IT IS FURTHER ORDERED that the deadlines for filing a reply is hereby due on or before November 4, 2022.

DATED this 28th day of September 2022.

UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:12-cr-00472-JAD-CWH